

ALBAUGH, LLC

GEORGIA OFFICE
P.O. Box 2127
Valdosta, GA 31604-2127
229.244.3288 (Phone)
229.244.5841 (FAX)

December 9, 2015

Document Processing Desk (DCI/PRD)
Attn: Ms. Katherine St. Clair
US EPA (7508P)
One Potomac Yard (South Building)
2777 South Crystal Drive
Arlington, VA 22202

Re: Imazethapyr Generic Data Call-in
ID# GDCI-128922-1549

Imazethapyr Ammonium Salt Data Call-In
ID# GDCI-128923-1547

Dear Ms. St. Clair,

The enclosed submission is Albaugh's 90-Day response for the above referenced Registration Review Data Call-In issued on September 18, 2015.

Albaugh's responses are summarized below.

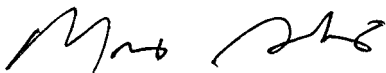
Option 3 - Offer to Cost Share

850.4100 - Seedling Emergence
850.4150 - Vegetative Vigor
850.4400 - Aquatic Plant Toxicity
850.3200 - Honeybee acute contact toxicity
850.3040 - Field testing for pollinators
SS-1155 - Residues in Pollen and Nectar
SS-1228 - Honeybee larval acute oral toxicity
SS-1253 - Honeybee larval chronic oral toxicity
SS-1313 - Honeybee adult chronic toxicity
SS-1319 - Semi-field testing for pollinators

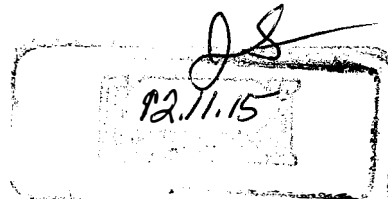
Albaugh will make an offer to cost share to the other registrants listed on the DCI concurrently with this submission.

Please call if you have any questions.

Regards,



Morris Gaskins
Registrations Manager
Albaugh, LLC
229-244-3288



Agri Star®
By Albaugh, LLC

PREMIER SUPPLIER OF OFF-PATENT CROP PROTECTION PRODUCTS
www.albaughllc.com



United States Environmental Protection Agency
Washington, D.C. 20460
CERTIFICATION OF ATTEMPT TO ENTER INTO AN
AGREEMENT WITH REGISTRANTS FOR
DEVELOPMENT OF DATA

Form Approved.

OMB Nos. 2070-0057;
2070-0107; 2070-0122;
2070-0164

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 15 minutes per response including time for reading the instructions, searching existing data sources, gathering and maintaining the data needed and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, Collection Strategies Division (2822T), U.S. Environmental Protection Agency, 1200 Pennsylvania Avenue, N.W., Washington, DC 20460. Do not send the form to this address.

Please fill in blanks below

Company Name
Albaugh, LLC

Company Number
42750

Chemical Name
Imazethapyr

EPA Chemical Number
005101

I Certify that:

My company is willing to develop and submit the data required by EPA under the authority of the Federal Insecticide, Rodenticide and Fungicide Act (FIFRA), if necessary. However, my company would prefer to enter into an agreement with one or more registrants to develop jointly or share in the cost of developing data.

My firm has offered in writing to enter into such an agreement. That offer was irrevocable and included an offer to be bound by arbitration under section 3(c)(2)(B)(iii) of FIFRA if final agreement on all terms could not be reached otherwise. This offer was made to the following firm(s) on the following date(s):

Name of Firm(s)
BASF Corp.
Adama Agan
Sharda Cropchem
Liberty Crop Protection
Nufarm Americas
PBI/Gordon Corp

Date of Offer
12/9/15

Certification:

I certify that I am duly authorized to represent the company name above, and that the statements that I have made on this form and all attachments therein are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature of Company's Authorized Representative

Date
12/9/15

Name and Title (Please Print or Type)
Morris Gaskins Registrations Manager

United States Environmental Protection Agency
Washington, D.C. 20460
DATA CALL-IN RESPONSE

OMB Approval 2070-0174
EPA FORM 6300-4

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form.
Use additional sheet(s) if necessary.

1. Company Name and Address ALBAUGH, LLC P.O. Box 2127 VALDOSTA, GA 316042127		2. Case # and Name N/A - Imazethapyr Chemical # and Name: 128922 Imazethapyr		3. Date and Type of DCI and Number 18-Sep-2015 GENERIC ID # GDCL-128922-1549	
4. EPA Product Registration	5. I wish to cancel this product registration voluntarily	6. Generic Data		7. Product Specific Data	
		6a. I am claiming a Generic Data Exemption because I obtain the active ingredient from the source EPA registration number listed below.	6b. I agree to satisfy Generic Data Requirements as indicated on the attached form entitled "Requirements Status and Registrant's Response."	7a. My product is an MUP and I agree to satisfy the MUP requirement on the attached form entitled "Requirements Status and Registrant's Response."	7b. My product is an EUP and I agree to satisfy the EUP requirement on the attached form entitled "Requirements Status and Registrant's Response."
42750-145			✓	N/A	N/A

8. Certification: I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law.

Signature and Title of Company's Authorized Representative

Morris Gasling
Registrations Mgr.
Albaugh, LLC

9. Date 12/9/15

10. Name of Company

11. Phone Number

(229)
229-2292

United States Environmental Protection Agency
Washington, D.C. 20460
REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

OvB Approval 2070-0174
EPA FORM 6300-3

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. Use additional sheet(s) if necessary.

1. Company Name and Address ALBAUGH, LLC P.O. Box 2127 VALDOSTA, GA 316042127	2. Case # and Name N/A - Imazethapyr Chemical # and Name: 128922 Imazethapyr	3. Date and Type of DCL and Number 18-Sep-2015 GENERIC ID # GDCL-128922-1549
---------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------

4. Guideline Requirement Number	5. Study Title	P R O T O C O L	Progress Reports			6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response
			1	2	3				
	Nontarget Plant Protection Data Requirements (Conventional Chemical)								
850.4100	Seedling Emergence and Seedling Growth (5, 23, 27)	N				T,C,A	TEP	12	3
850.4150	Vegetative Vigor (5, 23, 27)	N				T,C,A	TEP	12	3
850.4400	Aquatic Plant Toxicity Using Lemna spp (11, 24, 26)	N				T,C,A	COMMENT	12	3
	Terrestrial and Aquatic Nontarget Organisms Data Requirements (Conventional Chemical)								
850.3020	Honey bee acute contact toxicity (2, 3, 10, 14)	N				T,C,A	TGAI	12	3
850.3040	Field testing for pollinators (1, 4, 7, 13, 25)	Y				T,C,A	TEP	24	3
SS-1108	Honey bee acute oral toxicity (3, 10, 12, 25)	Y				T,C,A	TGAI	12	3

10. Certification: I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law.	11. Date 12/9/15
Signature and Title of Company's Authorized Representative <u>Morris Gaskins Registrations Mgr</u>	
12. Name of Company Albaugh, LLC	13. Phone Number (229) 244-3288

United States Environmental Protection Agency
Washington, D.C. 20460
REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

OMB Approval 2070-0174
EPA FORM 6300-3

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. Use additional sheet(s) if necessary.

1. Company Name and Address ALBAUGH, LLC P.O. Box 2127 VALDOSTA, GA 316042127	2. Case # and Name N/A - Imazethapyr Chemical # and Name: 128922 Imazethapyr	3. Date and Type of DCL and Number 18-Sep-2015 GENERIC ID# GDCL-128922-1549
--------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------

4. Guideline Requirement Number	5. Study Title	P R O T O C O L	Progress Reports			6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response
			1	2	3				
SS-1155	Residues in Pollen and Nectar/Field Residue Analysis (4, 8, 18, 25)	Y				T,C,A	TEP	24	3
SS-1228	Larval honey bee acute oral toxicity (3, 9, 17, 20, 25)	Y				T,C,A	TGAI	12	3
SS-1253	Larval honeybee chronic oral toxicity (3, 9, 16, 19, 25)	Y				T,C,A	TGAI	12	3
SS-1313	Honey bee adult chronic oral toxicity (3, 10, 15, 25)	Y				T,C,A	TGAI	12	3
SS-1319	Semi-field testing for pollinators (tunnel or colony feeding studies) (4, 6, 21, 22, 25)	Y				T,C,A	TEP	24	3

Mrs. Morris Gaskins
Registrations Mgr
Albaugh, LLC

12/9/15
(229) 244-3288